Exhibit D

Exhibit D

'000 Patent, claim 1

Claim Element	Allegations in the Complaint	Alleged Actors in the Complaint
1. An apparatus, comprising:	Paragraphs 97-101 of the Complaint 97. The Accused Instrumentalities comprise an apparatus for providing recruitment information. The infringing apparatus comprises servers, hardware, software, and a collection of related and/or linked web pages and mobile applications for providing recruitment information and services to individuals (including riders, job seekers, contractors, and employers) in the United States. The apparatus comprises a memory device, a processing device, and a transmitter. On information and belief, the Accused Instrumentalities comprise an apparatus built on the Amazon Web Services Platform, which is itself comprised of a multitude of components including the Lyft Multimodal Platform, Backend Platform Systems, Financial Applications, and the Lyft Website. Further on information and belief, the Lyft Platform relies on the Amazon DynamoDB, which is a database for delivering high performance at scale. Still further, on information and belief, Lyft leverages the Amazon Elastic Container Service for Kubernetes, and Amazon Lambda. *See* above. 98. On information and belief, the infringing Lyft apparatus further comprises a data lake on the Amazon Simple Storage Service (Amazon S3), which leverages Amazon Redshift to analyze the vast amount of data Lyft stores on the Cloud. On information and belief, the Accused Instrumentalities comprise an apparatus with multiple interconnected infrastructures, including but not limited to multiple data centers, including Amazon Web Services data centers located across the United States. *See* above. 99. On information and belief, the infringing Lyft apparatus maintains and stores in memory realtime data with respect to the location of available (and soon-to-be	Lyft

	available) Independent Contractors (*i.e.*, the drivers); the data includes at least information concerning the vehicle and present occupancy/capacity. On information and belief, the Lyft apparatus further maintains and stores in memory real-time data concerning the location and needs of the hiring entity or employer (*i.e.*, the rider). On information and belief, the infringing Lyft apparatus further filters all Independent Contractors by their respective GPS locations and capacities relative to the needs and location of the hiring entity (rider) in real-time; riders are then related to the most appropriate Independent Contractors. On information and belief, this "pairing" process is further informed by the estimated arrival time of the driver, as well as the mutual driver and rider preferences. *See* above. 100. On information end belief, the infringing Lyft apparatus processes the relevant information as noted above in order to approximate arrival times, and delivers job notifications out to the Independent Contractors in order of priority until the opportunity is accepted. Drivers are able to perform job search queries by going into "Driver Mode" to "Go Online" as an available contractor for hire. *See* above. 101. On information and belief, the infringing Lyft apparatus comprises a multitude of databases to store the pertinent data, all of which are based on the Amazon Web Services Platform. On information and belief, the Lyft Accused Instrumentalities comprise multiple data centers housing memory devices, processing devices, receivers, and transmitters. On information and belief, such data centers are located Worldwide. *See* above.	
a memory device, wherein the memory device stores work schedule information or scheduling information for an employer or a hiring entity, or for an	Paragraphs 102-103 of the Complaint 102. The Lyft Accused Instrumentalities comprise a memory device, which stores information regarding individuals available for applying for a job opportunity or hiring need. On information and belief, the Lyft memory device stores information concerning drivers who are available and willing to accept assignments within the Lyft network. Each such driver, on information and belief, is employed by Lyft as	Lyft

individual, an independent contractor, a temporary worker, or a freelancer;	an Independent Contractor and is retained by users of the Lyft apparatus to perform specific, defined tasks for the benefit of the user. *See* above. 103. The Lyft Accused Instrumentalities store work schedule information for each such driver (independent contractor) by virtue of the driver's "Online" availability, which is indicated via the Lyft Driver Mobile Application. *See* above.	
a receiver, wherein the receiver receives a first request,	Paragraph 104 of the Complaint 104. The Lyft Accused Instrumentalities comprise a receiver for receiving a first request from a communication device associated with a hiring entity (*e.g.*, the user of the Lyft Mobile App for Riders or, in the alternative, users of the Lyft web page at www.lyft.com). On information and belief, when a user seeks to place a Ride Request using the Lyft apparatus, a first request is generated to obtain the work schedule information for the known available Independent Contractors in order to generate an Estimated Time for Performance and populate the mapping function. If acceptable, the user has the option of placing the formal Request and completing the transaction. *See* above.	Rider (Lyft Mobile Application for Riders and/or use of the Lyft web page at Lyft.com)
wherein the first request contains information regarding a request to obtain work schedule information or scheduling information for the employer, the hiring entity, the individual, the independent contractor, the temporary worker, or the freelancer,	Paragraph 104 of the Complaint 104. The Lyft Accused Instrumentalities comprise a receiver for receiving a first request from a communication device associated with a hiring entity (*e.g.*, the user of the Lyft Mobile App for Riders or, in the alternative, users of the Lyft web page at www.lyft.com). On information and belief, when a user seeks to place a Ride Request using the Lyft apparatus, a first request is generated to obtain the work schedule information for the known available Independent Contractors in order to generate an Estimated Time for Performance and populate the mapping function. If acceptable, the user has the option of placing the formal Request and completing the transaction. *See* above.	Rider (Lyft Mobile Application for Riders and/or use of the Lyft web page at Lyft.com)

wherein the first request is transmitted from a first communication device associated with an employer or hiring entity or associated with an individual, an independent contractor, a temporary worker, or a freelancer	Paragraph 104 of the Complaint 104. The Lyft Accused Instrumentalities comprise a receiver for receiving a first request from a communication device associated with a hiring entity (*e.g.*, the user of the Lyft Mobile App for Riders or, in the alternative, users of the Lyft web page at www.lyft.com). On information and belief, when a user seeks to place a Ride Request using the Lyft apparatus, a first request is generated to obtain the work schedule information for the known available Independent Contractors in order to generate an Estimated Time for Performance and populate the mapping function. If acceptable, the user has the option of placing the formal Request and completing the transaction. *See* above.	Rider (Lyft Mobile Application for Riders and/or use of the Lyft web page at Lyft.com)
a processing device,	Paragraph 97 of the Complaint 97. The Accused Instrumentalities comprise an apparatus for providing recruitment information. The infringing apparatus comprises servers, hardware, software, and a collection of related and/or linked web pages and mobile applications for providing recruitment information and services to individuals (including riders, job seekers, contractors, and employers) in the United States. The apparatus comprises a memory device, a processing device, and a transmitter. On information and belief, the Accused Instrumentalities comprise an apparatus built on the Amazon Web Services Platform, which is itself comprised of a multitude of components including the Lyft Multimodal Platform, Backend Platform Systems, Financial Applications, and the Lyft Website. Further on information and belief, the Lyft Platform relies on the Amazon DynamoDB, which is a database for delivering high performance at scale. Still further, on information and belief, Lyft leverages the Amazon Elastic Container Service for Kubernetes, and Amazon Lambda. *See* above.	None
wherein the processing device is		None

specially programmed for processing information contained in the first request,		
wherein the processing device generates a first message containing the work schedule information or the scheduling information for the employer, the hiring entity, the individual, the independent contractor, the temporary worker, or the freelancer; and		None
a transmitter,	Paragraph 97 of the Complaint 97. The Accused Instrumentalities comprise an apparatus for providing recruitment information. The infringing apparatus comprises servers, hardware, software, and a collection of related and/or linked web pages and mobile applications for providing recruitment information and services to individuals (including riders, job seekers, contractors, and employers) in the United States. The apparatus comprises a memory device, a processing device, and a transmitter. On information and belief, the Accused Instrumentalities comprise an apparatus built on the Amazon Web Services Platform, which is itself comprised of a multitude of components including the Lyft Multimodal Platform, Backend Platform Systems, Financial Applications, and the Lyft Website. Further on	Lyft

	information and belief, the Lyft Platform relies on the Amazon DynamoDB, which is a database for delivering high performance at scale. Still further, on information and belief, Lyft leverages the Amazon Elastic Container Service for Kubernetes, and Amazon Lambda. *See* above.	
wherein the transmitter transmits the first message to the first communication device or to a second communication device,		None
wherein the apparatus processes information contained in a second request,		None
wherein the second request contains information for offering services of the individual, the independent contractor, the temporary worker, or the freelancer,	Paragraph 105 of the Complaint 105. On information and belief, when a user completes a formal Ride Request using the Lyft Accused Instrumentalities, the Request comprises a Second Request to engage and obtain the Lyft Independent Contractor in the vicinity, and to thereafter complete the ride transaction. On information and belief, the Independent Contractor Drivers are notified via "push notification" when a new ride opportunity is available, based on their proximity and capacity. If the initial driver does not timely respond by accepting the position, it is passed to the next available driver for consideration. Ultimately, the Second Request is confirmed, and the user is then provided with arrival information, including driver and vehicle data in real-time. *See* above.	Rider (Lyft Mobile Application for Riders and/or use of the Lyft web page at Lyft.com)

to the employer or hiring entity, or contains information for the employer or hiring entity reserving or requesting the services of the individual, the independent contractor, the temporary worker, or the freelancer,		None
wherein the information contained in the second request is based on the work schedule information or the scheduling information for the employer, the hiring entity, the individual, the independent contractor, the temporary worker, or the freelancer, contained in the first message.		None